

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
BUSINESS WATCHDOG, MERGENT
SERVICES, and JOHN ANDRIES BAL, JR.,

Plaintiffs,

-v-

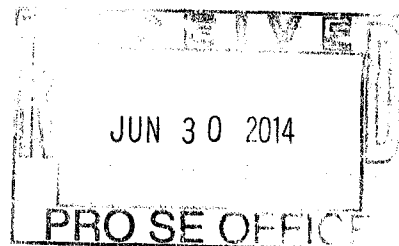
ITEX CORPORATION, STEVEN WHITE,
personally and in the capacity of CEO, CFO,
and Chairman of the Board, ERIC BEST,
personally and in the capacity of Director,
JOHN WADE, personally and in the capacity
of Director, ROBERT BENSON, personally
and in the capacity of Vice President, NYTO
TRADE INCORPORATED, JOHN CASTORO :
aka NYTO TRADE INCORPORATION aka :
NYTO TRADING CORPORATION aka NYTO :
TRADE EXCHANGE and 44 TRADE :
CORPORATION, aka NYTO TRADE, INC., :
personally and in the capacity of President, :
and IZZY GARCIA, personally and in the :
capacity of Manager, :

Defendants.
-----X

Case No.
13 Civ. 6794 (CM)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#
DATE FILED: 6/30/2014

STIPULATION



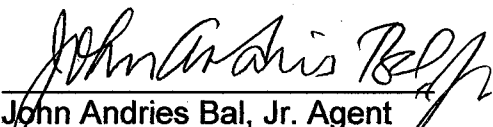
IT IS HEREBY STIPULATED AND AGREED between plaintiffs Business Watchdog, Mergent Services, and John Andries Bal, Jr. (collectively, "plaintiffs"), defendants Itex Corporation, Steven White, Eric Best, John Wade, and Robert Benson (collectively, "Itex defendants"), and NYTO Trade Incorporated, John Castoro, and Izzy Garcia (collectively, "NYTO defendants") that the time for plaintiffs to oppose the Motions to Dismiss submitted by the Itex defendants and the NYTO defendants is extended to August 11, 2014 (please see attached).

The NYTO defendants' Motion to Dismiss was not fully submitted until June 20, 2014.

IT IS FURTHER STIPULATED AND AGREED that the time for the Itex defendants and the NYTO defendants to reply to plaintiffs' opposition to the Motions to Dismiss is extended to September 11, 2014.

I respectfully ask the court to approve the above extensions of time.

Dated: New York, New York
June 26, 2014

By: 
John Andries Bal, Jr. Agent
85 Kenmare Street #35
New York, New York 10012
nycjohn123@msn.com
(212) 966-7576
Plaintiffs

SO ORDERED:

Hon. Colleen McMahon, U.S.D.J.

JOHN BAL

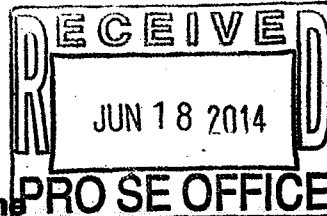
85 KENMARE STREET - #35
NEW YORK, NEW YORK 10012 - 4518

MERGENTserv@msn.com

TELEPHONE
(212) 966-7576

June 18, 2014

Hon. Colleen McMahon
United States Courthouse
500 Pearl Street
New York, NY 10007



Re: Request for extensions of time
Business Watchdog, et al. v. Itex Corporation, et al.
13 CV 6794 (CM)

Dear Hon. McMahon:

I am the plaintiff *pro se* in the above matter. Both of the defendants' attorneys have consented to an extension of time until August 11, 2014 for plaintiffs to respond to the defendants' Motions to Dismiss the complaint (please see attached emails).

Plaintiffs have consented to an extension of time until September 11, 2014 for all defendants to respond to plaintiff's opposition to the Motions to Dismiss the complaint.

I respectfully ask the court to approve the above extensions of time.

Respectfully,

A handwritten signature in cursive script, appearing to read "John Bal".

Agent

JB/
Enclosures

c: Jeremy Goldman, Esq. (by electronic mail)
Soma Syed, Esq. (by electronic mail)

John

From: "Goldman, Jeremy" <jgoldman@fkks.com>
To: "John" <mergentserv@msn.com>; "Soma Syed" <soma.syedesq@gmail.com>
Sent: Tuesday, June 17, 2014 1:57 PM
Subject: RE: Second Request: Business Watchdog v. Itex, 13 Civ. 6794 (CM) (S.D.N.Y.)

I am okay with this provided you agree that all defendants may have until September 11 to reply. Please confirm.

Jeremy Goldman | Frankfurt Kurnit Klein & Selz PC
488 Madison Avenue | New York, New York 10022
t: 212.705.4843 | f: 347.438.2156 | jgoldman@fkks.com

IP & Privacy Law Updates: www.twitter.com/ipprivacylawyer
Entertainment Law Blog: www.entertainmentlawmatters.com

From: John [mailto:mergentserv@msn.com]
Sent: Tuesday, June 17, 2014 10:26 AM
To: Soma Syed; Goldman, Jeremy
Subject: Second Request: Business Watchdog v. Itex, 13 Civ. 6794 (CM) (S.D.N.Y.)

Second Request

Re: Business Watchdog, et al. v. Itex Corporation, et al.

13 Civ. 6794 (CM) (USDC SDNY)

Jeremy Goldman, Esq. and Soma Syed, Esq.:

As I understand the procedures, I am required to seek a voluntary extension of time from you before making my request directly to the court. May I please have the courtesy of a response to my request for an extension of time until August 11, 2014 to repond to defendants' motions to dismiss the complaint?

John Bal

6/18/2014

John

From: "Soma Syed & Associates" <soma.syedesq@gmail.com>
To: "John" <mergentserv@msn.com>; "Joseph Maira Esq." <mogul12218@aol.com>
Cc: "Goldman, Jeremy" <jgoldman@fkks.com>
Sent: Wednesday, June 18, 2014 7:29 AM
Subject: Re: Second Request: Business Watchdog v. Itex, 13 Civ. 6794 (CM) (S.D.N.Y.)

Hi John,

We agree to extend your time to respond to NYTO Defendants motion to dismiss and give you till August 11, 2014 contingent upon that we get until September 11, 2014 for our reply to your opposition.

Thank you. Please advise.

Sincerely,
Soma

Soma Syed, Esq.
Soma Syed & Associates
Office: 347-951-9887
Fax: 347-923-3210

On Jun 17, 2014, at 10:25 AM, "John" <mergentserv@msn.com> wrote:

Second Request

Re: Business Watchdog, et al. v. Itex Corporation, et al.
13 Civ. 6794 (CM) (USDC SDNY)

Jeremy Goldman, Esq. and Soma Syed, Esq.:

As I understand the procedures, I am required to seek a voluntary extension of time from you before making my request directly to the court. May I please have the courtesy of a response to my request for an extension of time until August 11, 2014 to respond to defendants' motions to dismiss the complaint?

John Bal

----- Original Message -----

From: John
To: Soma Syed ; Goldman, Jeremy
Sent: Friday, June 13, 2014 11:16 AM
Subject: Bal v. Itex, 13 Civ. 6794 (CM) (S.D.N.Y.)

Re: Request for an extension of time

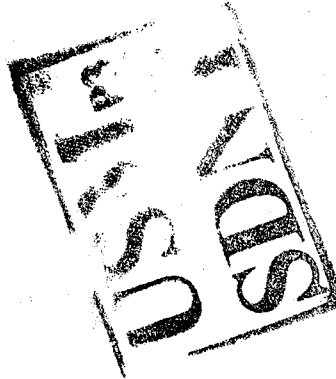
Jeremy Goldman, Esq. and Soma Syed, Esq.:

6/18/2014

PROUD VVA



John Bal
Apt. 35
85 Kenmare St.
New York, NY 10012



NEW YORK NY 100

27 JUN 2014 PM 10 L



PRO SE OFFICE
JUN 30 P 2:44

Pro Se Office
United States Courthouse
500 Pearl Street - 2nd Floor
New York, NY 10007

10007131699